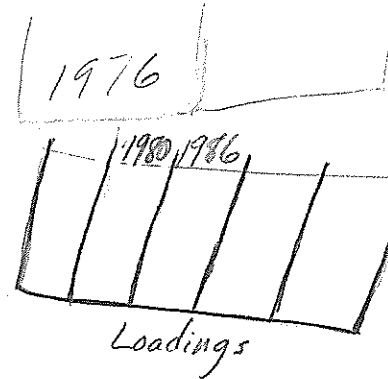


SEWER AUTHORITY MID-COASTSIDE

P. O. Box 67 501 Main Street
Half Moon Bay, CA 94019
Phone 415-726-5566



May 20, 1981,

State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95801

Gentlemen:

Under date of December 29, 1976, you issued your letter of "Concept Approval" on our Project No. C-06-1022, establishing an eligible funding capacity of 1.3 mgd ADWF for our planned 2.0 mgd ADWF treatment plant. This funding level was based on the best population figures and projections available at the time and was calculated on the E-O D.O.F. formula.

As you know, for various reasons beyond the control of SAM, this project has been delayed for almost four years. Even now SAM does not have a legally acceptable permit from the Coastal Commission to build this project, although the permit they have offered is for a 2.0 mgd plant as opposed to the 1.3 mgd plant permit offered in 1977. SAM's appeal to the State Coastal Commission of the illegal condition imposed by the Regional Coastal Commission is now scheduled for the State Commission's June 2-3, 1981 meeting.

Because of these regrettable delays, the cost of the project has almost tripled, and the ability of the local agencies to now fund their share of this project is seriously being questioned. It is for this reason that we are here requesting a reconsideration of the funding level for the treatment plant, originally established back in 1976. Several conditions have changed over this period of time which we feel warrant this reconsideration.

The population base for the SAM service area has experienced a dramatic increase of over 73% in the past decade. This is all the more remarkable in view of the fact that for most of this time SAM's member agencies have been under one form or another of connection bans and cease and desist orders. The City of Half Moon Bay alone has experienced an 81% increase in population and a 105.7% increase in housing units during this period of time, while most of the other cities in San Mateo County actually lost population. The overall change in population for all comparable cities in the County between 1970 and 1980 was only a 2.6% increase.

Within the past year both the County of San Mateo, presently representing approximately half the SAM service area comprising the Montara Sanitary District (MSD) and the Granada Sanitary District (GSD), and the City of Half Moon Bay, now representing the other half, have completed their Land Use Plans for the Coastal Commission mandated Local Coastal Programs (L.C.P.s). The County's Plan has already been certified by the Coastal Commission, while the City's locally adopted Plan is now being reviewed by the Coastal Commission. Projections for the year 2000 are thus now available which indicate more than a doubling of the population and thus service needs over the next 20 years.

CA Water Resources Control Board
Re: Project C-06-1022

May 20, 1981

The Association of Bay Area Governments (ABAG) has recently published its "Projections 79" statistics on population, employment and housing, covering 1980 to the year 2000 for all cities and their LAFCO spheres of influence in the San Francisco Bay Area. As the recognized regional planning agency for the Bay Area, ABAG's figures are to be used to allocate Federal and State funds for the construction of sewage treatment plants, per directions of the Governor's office of O.P.R. in February, 1978. These latest ABAG figures also show an approximate doubling of the population in the SAM service area by the year 2000.

Set forth below is a table showing the most authoritative statistics now available on what SAM's population has been, is and will be over the expected life of the planned sewer treatment plant.

	1970 <u>Census</u>	1980 <u>Census</u>	Year 2000		1985 <u>ABAG</u>	1990 <u>ABAG</u>
			<u>L.C.P.s</u>	<u>ABAG</u>		
City of H.M.B.	4,023	7,282	20,586	22,482		
M.S.D./G.S.D.*	<u>4,800</u>	<u>8,000</u>	<u>12,100</u>	<u>8,800</u>		
	8,823	15,282	32,686	31,282	20,453	25,079
		<u>646</u>		350		
*Estimate of service area (1979) → 14,636						

As mentioned earlier, even the Coastal Commission has finally recognized that SAM should build at least a 2.0 mgd ADWF plant at this time. Actually, the certified County L.C.P. provides for a sewage need of 1.97 mgd ADWF at buildout for the MSD and GSD areas alone, without the City of Half Moon Bay. The current flows of these three member agencies of SAM is now approximately 90% of the old 1.3 mgd ADWF capacity determined eligible for funding in 1976. Because of the aforementioned connection bans, there are presently hundreds of applicants on waiting lists for the next available sewer connections.

In view of the population projections set forth in the above table, it is apparent that a 2.0 mgd ADWF treatment plant will fall far short of SAM needs by the year 2000. Due to the fact that we have come so far with the present plans, EIR, permits, etc., as well as the present funding requirements and the time constraints imposed in our court order with the R.W.Q.C.B., however, SAM will only be able to build the 2.0 mgd ADWF plant at this time. Set forth below is a table showing our actual needs, and how SAM proposes to resolve these needs.

	<u>Population to Year 2000</u>	<u>Capacity Needs (M.D.G.)</u>	<u>Percent of Total Needs</u>	<u>Proportionate Share of 2.0 M.G.D.</u>
H.M.B.	20,586	1.7	63%	1.26
G.S.D.	7,260	.6	22%	.44
M.S.D.	<u>4,840</u>	<u>.4</u>	<u>15%</u>	<u>.30</u>
	32,686	2.7	100%	2.0

CA Water Resources Control Board
Re: Project C-06-1022

May 20, 1981

It should be noted that SAM's needs are based on *Where from* 82½ gpd per capita, without allowance for commercial, industrial or recreational, which may add from 12% to 21% additional, for a treatment plant in excess of 3.0 mgd ADWF by the year 2000. Obviously SAM will have to expand the 2.0 mgd ADWF plant before year 2000, as the 2.0 mgd ADWF plant will only be able to accommodate up to 75% of SAM projected service needs. *no commercial*


In her letter written to SAM on January 4, 1980, Deputy Attorney General M. Anne Jennings advised that . . .

"Further, if SAM wishes to attempt to get full funding for the 2.0 mgd plant, an amendment to the project report and request for amendment of the State Board's concept approval should be submitted as soon as the supporting population projections are available. If there is adequate documentation, it is possible that the State Board will now agree to fund a 2.0 mgd plant."

We trust that the information provided in this letter, together with the corroborating documents herewith submitted as enclosures, will satisfy the state's requirements for reconsideration and allow our eligible funding level to be raised to the 2.0 mgd ADWF level for the remaining phase of our project. If we can furnish anything else in support of this request, please contact us immediately and we will respond forthwith.

Sincerely,

SEWER AUTHORITY MID-COASTSIDE


W. Fred Mortensen
General Manager

WFM:rg

Enclosures: Final 1980 Census Populations
Preliminary Analysis of 1980 Census
San Mateo Times' News Reports
ABAG Projection 79

*Bob
Tuckerson*